

CR 21-222 WMW/ECW

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2252(a)(2)

v.

18 U.S.C. § 2252(a)(4)(B)

DRAYTON DEAN WILSON,

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2252(b)(2)

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

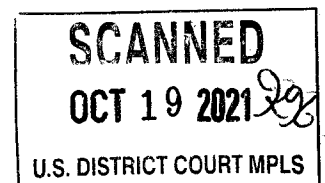
**COUNT 1**

(Receipt of Child Pornography)

On or about January 4, 2020, in the State and District of Minnesota, the defendant,

**DRAYTON DEAN WILSON,**

having been previously convicted under the law of the State of Minnesota relating to the aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, namely a conviction on or about February 2, 2010, in Cass County, Minnesota, for Criminal Sexual Conduct in the Second Degree, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means including by cellular telephone or computer device, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit:



Computer File Name	Description
File Gghgt.gif	An image file depicting a prepubescent girl masturbating an adult male.

all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT 2**  
(Possession of Child Pornography)

On or about June 1, 2020, in the State and District of Minnesota, the defendant,

**DRAYTON DEAN WILSON,**

having been previously convicted under the law of the State of Minnesota relating to the aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, namely a conviction on or about February 2, 2010, in Cass County, Minnesota, for Criminal Sexual Conduct in the Second Degree, did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image files:

Computer File Names	Descriptions
1) <u>iOS_image_upload (1)</u>	An image file of an adult male using his fingers to sexually penetrate the vagina of a prepubescent girl.
2) <u>1df630aae2521fc6e529d62fe73431c9.gif</u>	An image file of a prepubescent girl performing oral sex on an adult male.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**COUNT 3**

(Possession of Child Pornography)

On or about October 15, 2020, in the State and District of Minnesota, the defendant,

**DRAYTON DEAN WILSON,**

having been previously convicted under the law of the State of Minnesota relating to the aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, namely a conviction on or about February 2, 2010, in Cass County, Minnesota, for Criminal Sexual Conduct in the Second Degree, did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image files:

Computer File Names	Descriptions
1) <u>iOS_image_upload (1).gif</u>	An image file of an adult male anally penetrating a prepubescent child.
2) <u>ee2cf7aca200353376f575b5f6b528b2.jpeg</u>	An image file of a naked prepubescent girl lying down with her legs raised and spread. The minor victim is holding a foreign object against her genitalia. An adult penis is depicted on the right side of the image.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FORFEITURE ALLEGATIONS**

Counts 1 through 3 of this Indictment are hereby realleged and incorporated as if

fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

**DRAYTON DEAN WILSON,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to a T-Mobile REVVL4 5007Z cell phone with IMEI 015734000780442.

If the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 18 U.S.C. §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON